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FINAL REPORT

Review of Labour Branch Occupational Safety and Health Program

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1.0 EXECUTIVE SUMMARY

BACKGROUND

The Internal Audit and Risk Management Services (IARMS) conducted a review to assess and identify opportunities for improving the administration of the Labour Branch's Occupation Safety and Health (OSH) program.

The OSH program area has responsibility for enforcing compliance with Part II of the Canada Labour Code (CLC), which governs occupational health and safety in federal jurisdiction workplaces. The review focused on strategic and operational planning; roles, responsibilities and accountability; skills and support for safety officers; and information for decision making. The review work was conducted between August and November 1999.

Labour has undertaken many business improvement initiatives. This on-going work is addressing management and operational issues, including the need to strengthen and re-balance the OSH program.

However, HRDC needs to move forward quickly to address the risks still present in delivering OSH programming.

Further opportunity exists for the Labour/OSH program to strengthen strategic direction and priority setting. This would allow for improved co-ordination and consistency in planning and would facilitate strategic allocation of resources.

Additionally, the long-standing issue of limitations in program data and management information needs to be resolved. This has implications for effective risk management and performance measurement.

In 1997 IARMS completed a *Preliminary Survey of the Labour Program.* This focused on the Labour Program in general (five directorates at the time). Key issues identified included:

- *Program Direction* – there was a lack of overall program direction within Labour components on legislative priorities and capacity to deliver.

- *Accountability and Performance Measurement* – there were questions about the Labour Branch's management information needs and overall accountability for results at each level of the organization.

Since the time of this previous preliminary survey report, several business improvement initiatives have been undertaken by the Labour/OSH program. The program, however, has been operating in an environment of resource constraints for the past several years. This has limited the capacity to effect major changes to administration and operations. HRDC is seeking additional resources to address critical needs.

HRDC's Labour Branch is in the process of strengthening and re-balancing the OSH program through increasing resources for traditional enforcement activities, while also establishing a greater priority for preventive activities – a role highlighted in proposed amendments to Part II of the Canada Labour Code.

MAJOR FINDINGS

Strategic Direction

- As the Labour/OSH program re-positions in a changing regulatory environment, clear direction and priority setting is required to:
  - clarify the balance to be achieved between traditional enforcement and preventive activities within Part II (strategic resource allocation);
  - address potential trade-offs in managing Part II (OSH) and Part III (Labour Standards) workloads;
  - define how the program will carry out an increased proactive/facilitative mandate;
  - assess whether program objectives are being achieved; and then;
  - ensure capacity to deliver through provision of necessary tools, training, information and support to the regional and individual officer levels.

Operational Planning - Strategic Allocation of Resources

- Operational planning has been hampered by resource constraints, limitations in available data, and the need for clarity in program direction and priorities. Labour Affairs Officers in many cases deliver both the Part II (OSH) and Part III (Labour Standards) programs and in some cases Fire Prevention (FP); the level of reactive Part III work over the past few years has resulted in diminished capacity to deliver on Part II obligations. A variety of initiatives have begun to improve the Labour program's ability to deal with its Part III reactive workload, but managing the balance of resources between these two activities remains a challenge.

Results Measurement

- To date, the performance indicator for the OSH program (% of non-compliance situations resolved by acceptance of assurances of voluntary compliance) has not provided a meaningful measure of program effectiveness. The program has just developed a new key performance indicator; the Disabling Injury Incidence Rate (DIIR) which should facilitate improved performance tracking and accountability. This

indicator, however, in order to be useful in managing the program will need to be based on timely and reliable data. Initial implementation of the indicator will utilize available management information within the OSH program, which has limitations - described in a subsequent finding ("*Information for Decision Making*").

- Additionally, current operational measures such as Activity Tracking, Assignments by Tier, and Assignment Summary provide limited tracking value.

Supporting Capability

- Opportunities were identified to improve current operational policies and procedures and technology in support of OSH program efficiency and effectiveness. Training and development programs provided to safety officers could also be assessed.

- The program's role is increasingly one of collaboration and information sharing with clients. This will require a clear communications/client education strategy to guide development of tools and allocation of resources. A broad strategy was presented to the National Labour Operations Committee (Oct. 1999), but future progress will depend on development of an appropriate and resourced implementation plan.

Information for Decision Making

- OSH program planning and interventions are based on weak management information – the program has recognized for some time the limitations of their data. Program officials at all levels expressed concern over the timeliness, accuracy and comprehensiveness of information contained in both the Labour Applications 2000 (former LOIS) and the Federal Jurisdiction Work Injuries Database (FJID).

- To improve risk management, support intervention-planning tools, and in order to strategically target limited resources, the program requires access to stronger program data on the OSH performance of employers. Some regions have been able, through formal or informal agreements, to obtain information from Provincial Workers Compensation Boards. These regions stressed the usefulness and importance of access to such reliable, comprehensive databases.

- To maximize the effectiveness of targeted preventive measures, an increased capacity to research and "data mine", either at the national or regional level, would also be beneficial.

RECOMMENDATIONS AND MANAGEMENT RESPONSES

Six recommendations were addressed to the Labour Branch in collaboration with Regional Executive Heads. Appendix E of the report has the full text of the management action plan. Only the summarized management response follows each recommendation here.

1. Recommendation

Update OSH strategic direction and priorities to ensure clarity, promote consistency in planning, improve co-ordination and facilitate strategic allocation of resources.

Management Response

- The recent amendments to Part II of the Canada Labour Code have legislated the new strategic direction of the OSH program and necessitated the updating of priorities. Orientation sessions for safety officers, their managers, and clients are being organized to clarify the new regulatory approach.

- Program Directives on priorities of interventions (for Parts II and III combined) and tiering (i.e. ranking) of work sites under Part II are being updated, and analytical tools developed which will result in high-risk work sites being targeted for prevention activities.

- A five-year strategic plan and accompanying business plans will be developed in collaboration with client groups and will be widely communicated internally and externally.

2. Recommendation

Continue to address the long-standing issue of limitations in program data and management information through various measures. One possible means of improving the timeliness, accuracy and comprehensiveness of program databases is agreements with provincial Workers' Compensation Boards to obtain injury information.

Management Response

- Maintain and strengthen internal data collection to provide necessary information for strategic allocation of resources, risk management and program performance monitoring. Rationalize databases and integrate with WCB data, as it becomes available. Specific steps taken to address data limitations include:

- Will improve collection, validation, system entry, employer forms and quality assurance for both the Employer's Annual Hazardous Occurrence Investigation (EAHOIR) reports and Hazardous Occurrences Investigation Reports (HOIR).

- Labour Applications 2000 contains enhancements to allow more accessible, accurate, complete and timely data for staff and managers.

- The OSH Program will continue to pursue the obtaining of federal injury information from provincial and territorial Workers' Compensation Boards (WCBs). A review of local data sharing agreements with WCBs has been undertaken to provide information on key issues and potential partners for pilot agreements. Discussions will continue with established contacts with the Chief Financial Officers of WCBs and with members of the OSH Committee of the Canadian Association of Administrators of Labour Legislation (CAALL-OSH committee) to promote injury information sharing agreements. Based on preliminary discussions, one or two WCBs will be selected to pilot negotiations for data sharing agreements.

3. Recommendation

Implement the new key performance indicator (DIIR) and monitor and report on progress towards goal attainment. The utility of this indicator will depend on the quality of underlying OSH program data (see previous recommendation).

Management Response

- The National Labour Operations Committee (NLOC) adopted the new indicator Disabling Injury Incidence Rate (DIIR) in Oct.1999. They also approved a three-phase implementation plan in Feb. 2000, which includes steps to overcome data limitations and integrate the DIIR into the Program's performance measurement framework.

4. Recommendation

Use the DIIR data in day-to-day program management, setting performance targets for managers, and directing resources to higher risk areas within or across regions.

Management Response

- A performance measurement management framework will be developed and will address performance targets at all levels as well as strategic allocation of resources. More specifically, the performance measurement management framework will set overall Program goals/targets for reducing the DIIR, discuss how to integrate performance targets in strategic plans, business plans and local performance objectives and the overall accountability structure; and discuss the form, manner and timetable for performance reporting and monitoring. Data similar to the DIIR is being used since 1999 in the planning of interventions with clients.

5. Recommendation

Ensure that tracking of operational measures is adequate and meaningful.

Management Response

- Operational performance measures will be integrated with the performance measurement management framework mentioned in the management response for recommendation 4 above. Requirements for new and updated operational performance measures will be reviewed. Additional performance measures recommended for development by the OSH Performance Indicators Working Group will be considered for implementation. LA2000 will provide managers at all levels with the tools to monitor and assess the performance of their resources towards meeting their goals and adjusting their work plans in response to shortfalls.

6. Recommendation

Continue development and implementation of a national client education strategy, including appropriate resourcing and tools.

Management Response

- A plan to resource client education is being developed. Additional resources will be assigned to Client Education. Clients will be surveyed to determine their publication needs and results will be used to update publications. A client education strategy for the implementation of Part II amendments has been drafted. Three approaches will be used: tripartite, sectoral and individual client (employer/employees).

2.0 INTRODUCTION

The 1999-00 HRDC Audit and Evaluation plan included a review of the Labour Branch Occupational Safety and Health (OSH) Program. The review was a broad look at the management of the OSH program rather than a specific file review of OSH assignments, consequently findings relate to management fundamentals. The review objectives and scope are outlined in Appendix A.

OSH in federal works, undertakings and businesses is governed by Part II of the Canada Labour Code (CLC). The policy objective is to *prevent accidents and injury to health arising out, linked with or occurring in the course of employment.* The visibility of Labour/OSH within the larger context of HRDC has been a challenge for the program. When measured by traditional means of program expenditures and FTEs, the program is only a fraction of HRDC activity. A brief program profile is shown in Appendix B.

The review findings focus on the critical needs within the OSH program and can assist the Labour program in decisions regarding the strategic allocation of resources. Labour has been seeking additional funding. This increased funding should allow the program to more optimally address current and anticipated risks and deal with the impact of amendments to Part II of the CLC.

3.0 REVIEW FINDINGS

1. Strategic Direction

Labour is in the process of strengthening and re-balancing the program by increasing resources for inspections, establishing a greater priority on prevention activities and through amendments to Part II/OSH Canada Labour Code (CLC). There is clear recognition of the pressures and changes that Labour has had to deal with in the past five years. Program officials are sensing that operational pressures are gradually easing and believe initiatives in place or planned will bring further improvements. Some of these more recent initiatives include the National Client Education Committee, the OSH Fatality Study and the new opportunities to recruit staff. However field staff and managers are not clear on the strategic directions of the Labour program both within the current environment of resource constraints as well as the new environment should additional resources be allocated. This stems from the following:

- Proposed legislative changes that will create new expectations and client needs;
- Most of the program emphasis has been on reactive work in Labour Standards at the expense of preventive activity, a scenario that has increased OSH program risks;
- New initiatives are calling attention to the need to assess how program objectives will be achieved;
- The Labour/OSH resource model only addresses resource capacity for inspections, yet the program is still at a risk high in terms of the number of program inspections required, based on their risk assessment processes; and
- The OSH program cannot operate in isolation of other Labour Operations areas (most notably Labour Standards) or in isolation of the regional delivery environments.

Therefore, as the Labour/OSH program re-positions in a changing regulatory environment, clear direction and priority setting is required to:

- clarify the balance to be achieved between traditional enforcement and preventive activities within Part II (strategic resource allocation);
- address potential trade-offs in managing Part II (OSH) and Part III (Labour Standards) workloads;
- define how the program will carry out an increased proactive/facilitative mandate;
- assess whether program objectives are being achieved; and

- ensure capacity to deliver through provision of necessary tools, training, information and support to the regional and individual officer levels.

This program clarity on strategic directions would allow Regions and NHQ too more effectively: plan and target interventions; identify what skill sets are required; recognize essential information; strive for consistent service for national clients; guide new staff and managers on achieving program objectives; and partner and collaborate to address workplace safety.

2. Operational Planning – Strategic Allocation of Resources

Resource constraints, limitations in available data, and the need for clarity in program direction and priorities have hampered operational planning.

Labour Affairs Officers (LAOs) in many cases deliver both the Part II (OSH) and Part III (Labour Standards) programs and in some cases Fire Prevention (FP). In the last number of years LAOs have had to largely concentrate on the high volume of reactive Part III activity which has resulted in diminished capacity to deliver on Part II obligations. This approach is in line with the Labour Operations Program Directive (OPD) where Part III complaints have a higher priority than OSH programmed inspections and promotional activity. Field staff would like to see a shift to more preventive activity in order to be visible to clients, to strengthen Labour's credibility and to assume a strong role of regulator.

Labour/OSH have not been able to undertake the volume of programmed inspections in accordance with their risk assessment of industry work sites. Regions have fallen short of completing inspections on work sites tiered 'high risk'. An examination of completed inspections for the first six months of fiscal year 1999-00 in the 5 regions covered by the review revealed that inspections completed are low when based on the national tiering model. Appendix C, Table 1 provides a partial snapshot of inspection activity.

All regions expect to increase the number of inspections carried out, largely due to the fact that some internal HRDC reallocation of resources has occurred to help Labour minimize their program risks. Also the creation of the Part III Early Resolution Officer has freed up some the LAO's time. Regions pointed out that there would be exponential growth in workloads as they get back into inspections that must be taken into account when planning increased inspection activity. As work-sites had not been visited recently, it will be necessary to establish or re-build rapport with clients and in all likelihood other interventions may be required as follow-up on inspections. It will also take time before new LAOs are fully trained and skilled to carry a full workload.
Another influence on operational planning has been the lack of stability in management positions in a number of regions. In an environment where resources, sound management

information and planning tools are minimal, this presents an additional challenge, particularly when trying to plan preventive activity.

Two operational practices that have supported the Labour risk management approach are (1) the specialist-generalist concept and, (2) industry risk tiering. Both of these approaches continue to present challenges for the program.

2.1 Specialist-Generalist Concept

The concept and application of the Labour *specialist-generalist* is defined in a 1985 operational planning directive (OPD). Some of the opportunities and challenges this concept has provided the program are outlined below.

Opportunities

- Flexibility to reassign resources to the reactive workload of Part III when it was beyond the capacity of Labour Standards specialists to complete all of the work.
- Economies when LAOs are able to perform Part II, Part III and/or Fire Prevention functions when scheduling work-plans particularly in non-urban areas. It was viewed by some as a 'good way to get mileage from resources'.
- Increased classification levels when staff perform both specialist and generalists functions.

Challenges

- Diminishing the time and effort spent on Part II activity as the increase in Part III reactive activity led to reassignment of both OSH generalists and specialists to Part III duties.
- Difficulty maintaining a skill base in Part II when not enough time is spent in that area.
- Expanding knowledge and skill expectations for the LAO position. Managers and field staff all recognized the challenge to be proficient in two to three LAO disciplines (safety and health, labour standards or fire protection).

Some felt UCS outcomes would add clarity to the continuing viability of the Specialist-Generalist concept and that it would be premature to review and draw conclusions at this stage. As well, many agreed there was now a start in the re-balancing of the LAO workload so that specialist-generalist disciplines will be respected in accordance with the OPD.

2.2 Industry Risk Tiering

National industry risk tiering is the starting point for targeting and prioritizing regional inspections of federal jurisdiction work-sites. Ensuring that accurate and timely data was utilized in industry tiering was a field concern. Since the level of inspections has been very low in the last number of years, updated data on client work-sites has not been generated. To further exacerbate the problem, data is not always input into Labour Operations Information System (LOIS)[1] when an inspection is completed, industry accident reporting is not always documented and an accurate picture of the program client universe is difficult to achieve for a variety of reasons. Regions can vary the national tiering to account for their priorities and client needs. Figure 1 illustrates the differences that can occur between national and regional tiering.

Figure 1

Tiering Rating	1	3	5	7	9	Total
Risk Description	very low	low	medium	high	very high	
Work-sites National Industry Tiering	6,461	3,701	11,133	9,347	11	30,653
Work-sites Regional Site Tiering	8,495	8,078	7,568	6,710	118	30,969

While the reliability and completeness of data presents a challenge, tiering is a valuable tool to assist in operational planning and risk management. Recognizing the need to more closely equate risk with capacity, some review of tiering has taken place. The 1998 Labour Resource Model Working Group revised the national tiering criteria for their resource model on inspection activity. As well NHQ has recently developed an intervention-targeting tool to assist field operations in planning. It includes two approaches: targeting by work sites and by industrial sector/work injury profile. This was presented to the National Labour Operations Committee (NLOC) in October 1999 and regions have already begun to test it out.

[1] LOIS is referenced in the report as Regions and LAOs were using this terminology. LOIS is now considered LA2000.

3. Results Measurement

The program has just developed a new key performance indicator; the *Disabling Injury Incidence Rate* (DIIR) which should facilitate improved performance tracking and accountability. To date, the current key results indicator, percentage of situations under Part II of the CLC of non-compliance (excluding situations of danger) voluntarily resolved through the acceptance of *Assurances of Voluntary Compliance* (AVCs) has not provided a meaningful measure of program effectiveness. All regions felt a more meaningful indicator for the program was long overdue despite the challenge of developing measures for a 'preventive mandate'. An improved indicator is expected to help in day-to-day program management including decisions for directing resources to risk areas within and across regions.

The new DIIR indicator, however, in order to be useful in managing the program will need to be based on timely and reliable data. Initial implementation of the indicator will utilize available management information within the OSH program, which has limitations - described in a subsequent finding ("*Information for Decision Making*").

This new indicator also brings the program closer to other jurisdictions that have results–oriented approaches to performance measurement (see Appendix C). The federal OSH jurisdiction will be included in a review by the Canadian Association of Administrators of Labour Legislation Occupational Safety and Health Committee (CAALL-OSH) to look at the state of performance measurement in OSH agencies in Canada. Perceived advantages to a national system of performance measures include possibilities for directing cooperative safety activities to areas of common concern and allowing for benchmarking of performance among jurisdictions.

Operational Measures

Now that most of the major work of developing a new key OSH performance indicator is near completion, there is an opportunity to concentrate efforts on OSH secondary operational measures. These measures would complement the new Disabling Injury Incidence Rate (DIIR) and help track its progress. Managers identified a need to expand the level of management information they have available to monitor ongoing OSH operational performance. Although there is a requirement to report to NHQ on planned volumes of the 27 different Part II assignments, regions are unclear as to the monitoring or analysis completed on this data. The major management operational reports available from LOIS: Activity Tracking Report; Type of Assignments by Tier; Assignment Summary, etc. have some limited tracking value but need to be supplemented with more meaningful measures.

4. Supporting Capability

Opportunities to improve support of employee capabilities to achieve OSH objectives were identified. These were in the areas of training, tools, and client education.

4.1 Training

On a periodic basis training practices and approaches need to be examined to ensure they address the skill needs of OSH officers. The demand for training is expected to increase as new employees are hired to meet current and future operational requirements.

A national training program exists for LAOs and is linked to the specialist/generalist concept. Training is provided to become a specialist in OSH, Labour Standards or Fire Protection. Additionally, training is provided in one of the other remaining fields to fulfill the generalist role. The OSH consecutive 4-week basic (theoretical) training in Part II of CLC is traditional classroom-based training. Most LAOs indicated the OSH basic training provided an excellent knowledge base of the CLC. LAOs supplement this basic training with a variety of OSH related courses and professional development opportunities. For example, some LAOs initiate their own accreditation into the Canadian Registered Safety Professionals (CRSP). The CRSP includes a mandatory maintenance program. LAOs saw this designation as adding credibility with provincial colleagues, courts and clients as well as a measure to ensure professional development remains current.

There were some training issues regions felt needed to be explored to enhance the effectiveness of training opportunities. These were:

- The availability of French speaking trainers for national training programs, as the current extensive use of regional trainers is difficult for some regions to accommodate.

- Finding ways to make the basic training more 'dynamic', modularized and/or have new modes of training implemented. For example, a form of self-directed/computer-based training modules where appropriate and cost-effective is one possibility.

- Integrating some 'practical' applications with the 'classroom' training, such as by visiting work-sites.

- Organizing formal training on new regulations on a consistent basis.

- Coaching of new LAOs following the basic training it is a challenge for some locations either because of loss of expertise, workload pressures or lack of systemic approach.

4.2 Tools

Technology

LAOs use the Labour Operations Information System (LOIS) for work planning and case management but it has limitations particularly in terms of accessing data. The LA2000 project will address these limitations by creating a single national database accessible at national, regional and local levels as opposed to 18 databases across the country. Better reporting capabilities and sharing of information are anticipated results of flexible access. Lead site implementation is planned for October 2000.

Mobile LAO (MLAO) portable technology is one of the tools developed for LAOs to facilitate their work planning, mobility, and responsiveness to clients. Adaptation to MLAO technology is more challenging for some LAOs. MLAO and LOIS are not part of the basic OSH/Part II training. Most LAOs get training in MLAO as part of Part III basic training and combine this with on the job training. Quebec Region has assigned an officer as a full time resource on MLAO to assist LAOs in becoming proficient in its application.

LOIS/MLAO data entry is considered very time consuming and cumbersome by many of the LAOs. This coupled with the slower adaptation of some LAOs to MLAO, impacts on the reliability of information on LOIS.

Operational Planning Directives

LAOs found the Operational Planning Directives (OPDs) useful guidance and important to ensure consistency in the program. They find it especially convenient to be able to access them electronically on MLAO. Some OPDs still need to be updated and work is in progress on OPDs for *Priority for Interventions* and *Part II Inspections*, two subject areas that will help in the planning of field activities. Unless OPDs are reviewed and updated as required, the potential exists for regions to move ahead in different directions and adopt strategies they consider more appropriate for their clients. For instance, in one region they are giving advance notice of an inspection to clients in most cases as opposed to dropping in on clients unannounced as directed in an OPD. The region finds it more efficient to give the advance notice especially in terms of travel and scheduling. More importantly, it reflects the partnership and educational approach they want to develop with clients and moves towards greater responsibility for employers and employees.

Equipment and Laboratory Services

LAOs indicated they had adequate equipment, such as personal protective gear and survey kits. They utilize the services of regional industrial hygienists where available and believe the Industrial Hygiene Laboratory services are an essential resource to the OSH program.

4.3 Client Education Strategy

Regions have been concerned about the lack of client education material available and the potential this creates for disparity in client service. The situation is more compelling when

inspection levels cannot meet program risk estimates and other activities to promote compliance are needed to complement inspections.

Some of the regions have had little choice but to take initiatives to develop material to meet client and operational needs, while other regions have not been able to fill this void. The current situation carries the potential for duplication, inaccuracy, language requirements not being met, and/or loss of learning. It also puts at risk the principle of national consistency for Labour clients.

Regional communications efforts have included production of printed materials for clients such as hazard alerts and an employer self help kit, development of regional communications plans, staffing a Labour Consultant Communications position, and establishing partnerships with provinces and industry associations to collaborate on communication and education products.

The Labour program established a National Client Education Committee to find solutions to address the need for a communications/client education strategy. A broad strategy was presented to the National Labour Operations Committee (Oct. 1999), but future progress will depend on development of an appropriate and resourced implementation plan.

5. Information for Decision Making

5.1 Internal Management Information

Labour/OSH has recognized since some time the limitations of their program information. Even the combined information of the Labour/OSH in-house inventories of the federal jurisdiction universe, LOIS and the Federal Jurisdiction Work Injuries Database (FJID), do not meet the needs of the program. A number of the working groups, (e.g. Performance Indicator -1999, Resource Model -1998, and Program Risk and Liabilities - 1997) addressing Labour program improvement process have acknowledged that data limitations made their tasks more difficult. Additionally, the lack of timely, accurate and comprehensive data was a consistent weakness identified by all regions. To improve risk management, support intervention-planning tools, and in order to strategically target limited resources, the program requires access to stronger program data on the OSH performance of employers. This data also impacts on the program's efforts to do the research and data mining needed to advance program objectives at national and regional levels.

5.2 Workers Compensation Board (WCB) Information

All regions believed provincial Workers Compensation Boards (WCB) have the critical data to address many of the information needs of the Labour/OSH program. It is important that all regions and LAOs are similarly advantaged to effectively plan and carry

out their client interventions. Some regions have been able, through formal or informal agreements, to obtain information from Provincial WCBs. These regions stressed the usefulness and importance of access to such reliable, comprehensive databases.

There are obstacles to overcome in obtaining data from WCBs, such as: privacy and access to information concerns; cost for services/data obtained; and technology and data transfer.

Regions and NHQ need to work together to develop a strategy to negotiate agreements with provincial WCBs. There are existing arrangements and networks with the provinces that offer some learning to negotiating receipt of WCB data. At a national level Labour has a history of negotiations with provinces for administrative agreements. This takes place to reimburse WCBs and pay administrative fees for the Government Employees Compensation Act (GECA). These agreements represent about one-third of the federal jurisdiction. Additionally, the Canadian Association of Administrators of Labour Legislation OSH Committee is a networking source to solicit provincial partnership support from WCB. This forum could be an opportunity to strengthen the case for obtaining WCB data for the OSH program. HRDC Labour Market Development Agreements are also an illustration of working with provinces to share certain protected information while ensuring provisions of privacy and freedom of information legislation is respected.

5.3 Client Information

There are a number of avenues to obtaining injury and accident information on federal jurisdiction clients. One means is the annual mail-out of the Employer's Annual Hazardous Occurrence Investigation Report (EAHOIR) to all federal jurisdiction employers listed in the FJID databank. Employers are asked to submit this written report no later than March 1st of each year. No action is taken to penalize employers who fail to respond to this Part II CLC *Regulation 15.10* requirement, even though the employer response rate on the EAHOIR is in need of improvement. One initiative to address employer non-response is to request regions to track down employers who have failed to send in their EAHOIR but this task is very time-consuming for regions operating with limited resources. Further, the information obtained from employers on the EAHOIR is not validated on a systematic basis and there is no cross-match of information with WCB data.

Additionally, federal jurisdiction employers are required to report any hazardous occurrence at their work-sites, whether a worker injury resulted or not. This is by means of the Hazardous Occurrence Investigation Report Form (HOIRF) which regional LAOs review, if employers remember to report and send the form into the local office.

Thirdly, employers complete a WCB (province) report whenever a worker injury claim must be made. This information is available to some regions where agreements with WCBs exist.

From a client service perspective there is a heavy reporting burden for federal jurisdiction employers. At the present time, there is no option of electronic reporting, a measure that has potential to improve client service and response rate. The province of British Columbia has a strategy to introduce compulsory electronic reporting of WCB claims within five years. As well Labour/OSH in BC was asked to pilot a web-site for electronic hazard occurrence reporting by both an employer and union association. Additionally, partnering with provincial WCBs may present opportunities to find a more efficient way to collect some of the needed information where legislative reporting requirements between federal and provincial jurisdictions are similar.

5.4 Federal Jurisdiction Client Universe

An accurate universe for the federal jurisdiction is important for work planning, resourcing, program research, and client service. Regions have a constant battle to maintain an up-to-date client universe. Employers open, close or amalgamate work sites and the pace varies due to regional, economic, and industry variables. Importantly, accuracy of the client universe may also be questionable due to: LOIS information not entered or updated; employer failure to respond to the EAHOIR; decline in programmed inspections; and the shifting nature of the economy.

Labour offices have taken various initiatives to update the client universe. For example: the results of one project in a small office visited shows the potential for improvement. They removed 104 (50%) of the air industry work sites from LOIS as invalid and changed the work site count for one federal department from twenty-three to one. Also regions have established collaborative arrangements with trucking associations and sometimes jointly with the provinces to address safety issues on an industry basis. This facilities obtaining a more accurate picture of the universe for road transport, one industry that is categorized as high risk due to the serious injuries occurring in some regions.

5.5 Quality Review Information

Quality review of LAO assignments was one area all regions felt was neglected. The quality control/assurance process suffers for a number of reasons: workload pressures/ priorities; changes in management; technical experience level of managers; and no national emphasis on this quality process. Indications of the need to address quality issues include:

- the findings of the April 1999 Labour Fatality Study which shows deficiencies in accident reporting, record keeping and non-compliance with instructions in OPDs;
- uncertainty raised regarding the consistent application of key terms, (e.g. work-site & assignment);
- general lack of confidence in the accuracy and completeness of OSH data collected;
- the number of inspection assignments open over 90 days on LOIS, (the review found 270 inspection assignments open in the 5 regions visited); and
- there are more new staff doing assignments.

Quality control (QC) was viewed as the responsibility of Labour Managers/Team Leaders/Directors and the TA has the role of quality assurance. Regions have been largely left to develop their own quality review policies. For example, Ontario developed a regional quality assurance program in 1996, which they have tried to implement and will review this fiscal year for further refinement of the process. Other regions have some degree of formal/informal processes in place. The quality review process should be discussed by NLOC so that sufficient actions are undertaken to ensure work practices are meeting acceptable standards.

6. Roles, Responsibilities & Accountability

Although roles and responsibilities were examined at the various levels, it was outside the scope of this review to determine the appropriateness of the organization design in place for Labour/OSH. However, there were concerns expressed about the complexity of managing functional and line roles and responsibilities within the current departmental structure. For example, striving to achieve uniformity and consistency in the application of Canada Labour Code (CLC) across all regions is made more challenging. A broad corporate review of accountability structures, which began this spring, is expected to identify improvement options for managing within current organizational structures.

In the meantime, there is an opportunity to explore and align roles and responsibilities with changing program expectations and to develop accountabilities for existing and emerging challenges as Labour/OSH addresses the preceding findings in this report.

Review findings regarding function direction, roles and responsibilities for safety officers and technical advisors, jurisdiction agreements and collaborative relationships are outlined below.

6.1 Functional Direction

The National Labour Operations Committee (NLOC) is considered a very effective collaborative body and supports NHQ in their functional role. Directors and managers feel it has been successful in addressing important program issues and building the visibility of Labour internally. Regional representatives on NLOC are part of their regional management teams so are able to influence regional decision-making and promote the program internally. The only suggestion on the functioning of NLOC was a preference to see it concentrate more on strategic and management issues as opposed to operational/administrative items, thus leaving working groups/committees to deal with appropriate operational matters. A review of NLOC minutes over the past year shows a broad range of program issues and developments are covered thus making it important to have strategic priority setting.

Within the Labour Operations Branch, relationships and coordination of activities are complex. At a national level NHQ-OSH must align its operations with Fire Prevention (FP) activities and is one of five branches in Labour Operations. OSH shares in the services of Client Education and Training and Labour Operations Application Development functional units.

Field staff was not always familiar with the role or activities NHQ was carrying out. They realize NHQ has lost some of their expertise and are making efforts to improve the capacity issues of the program. The one important matter for field staff was that NHQ have timely progress and resolution on issues. Examples include production of revised or new OPDs, development of client education materials, and technology that better supports work planning needs.

Organizational models for Labour varied in the regions visited and regions felt that this asymmetry worked well for meeting their regional objectives. OSH operations are integrated with other Labour business lines such as Labour Standards. In three of the five regions visited OSH/Labour was a separate operation and in the other two the operation was managed as another HRCC business line.

6.2 Labour Affairs Officer - Safety Officer (SO)

Most safety officers operate under the specialist-generalist concept. Safety officers are strongly committed to ensuring safe workplaces under federal jurisdictions and take pride in their profession. As resource pressures within the Labour program are gradually resolved, safety officers hope to take up more proactive preventive activity. Amendments to CLC Part II will also bring new/varied roles for safety officers.

During interviews with field staff there was a range of terms used to describe various facets of the LAO/SO. Examples included regulator, consultant, facilitator, information provider, guide, trainer, advisor, inspector, monitor, and enforcer. All identified with the regulator role. Uncertainty arose over the balance to be struck between the preventive and enforcement role, how extensive and in what form the preventive role should take, and whether they would be adequately supported in pursuing proactive prevention interventions. This uncertainly was more evident with new staff.

6.3 Technical Advisors (TA)

The TA functional role is a very important link in the operations of Labour OSH. There are five regional advisors to support the OSH community: one each in Ontario and Quebec, one shared for British Columbia and Alberta, one for Saskatchewan and Manitoba and one for the Atlantic Provinces. The TA network meets formally at least three times a year.

The advice and support from TAs is highly valued by officers and managers in all regions; everyone agreed they carry a lot of responsibility. This included functional guidance to field staff, advice to management teams on issues such as planning, technical advice and recommendations for NLOC, external liaison with stakeholders, assisting with corporate files and the key link between NHQ and field staff. The importance of the TA function has been further increased due to the fact that, within HRDC, new managers have been hired based on the departmental leadership profile but may not necessarily have the technical background in Labour OSH that had historically been the case.

OSH/TA are faced with a number of pressures including: responsibility for large geographic areas; requests for their input/time to national program issues (e.g. follow-up work to the NHQ Fatality Report); and growing reliance of new team leaders/managers without program experience to depend on their expertise. Program officials suggested addressing these pressures by having more OSH/TA in place or creating a senior safety officer position to reduce the need for TA help in field offices.

6.4 Jurisdiction Agreements

Labour/OSH has a number of administrative arrangements in place for the application and enforcement of the Canada Labour Code, Part II. This extended jurisdiction is believed to represent approximately 5% of the total federal jurisdiction. The primary extended jurisdiction partner is Transport Canada (TC). The memorandum of agreement (MOU) with TC for the federal transportation sector was re-negotiated in 1998. One of the attributes in the TC-MOU process was the establishment of interdepartmental committees on OSH (ICOSH) at NHQ and in Regions (RICOSH) to coordinate MOU matters.

Assessing the effectiveness of the work carried out by TC and compliance to the control provisions outlined in the MOU to ensure performance and accountability was not part of this IARMS review. Transport Canada is conducting reviews of the Aviation-OSH Program and Marine Safety.

Regions indicated that there are particular areas that need to be clearly addressed in agreements to ensure effective operations and a satisfactory comfort level for transferring accountability. These included:

- sufficient training and capabilities of inspectors;
- standards and/or priorities established and shared;
- a service level regarding availability and response time when incidents such as refusals to work occur; and
- provisions to develop and implement a performance-based management system as part of the evaluation process of the agreement and to monitor the application and enforcement of the CLC.

6.5 Collaborative Relationships

Collaborative relationships, both internal and external, are an important component to support achievement of program objectives. Although Labour has a strong tradition of partnerships new opportunities to establish relationships will emerge as program needs change. For example, it is anticipated that amendments to Part II will also create more demand for OSH consultants to help in the transition to self-regulation. When the possibility for confusion of clients exists as a result of new and emerging players it is important that a relationship be developed to ensure roles are compatible.

It was suggested that OSH be promoted more actively internally to the mutual benefit of OSH and other HRDC clients. Internal partnership opportunities could take several forms such as promoting the OSH program at appropriate HRDC stakeholder/client events, linking client educational materials, sharing external partnership experience and lessons learned, and supporting an overall holistic HRDC approach to improving the working environment of our clients. Youth have been identified as a priority client group for HRDC and were mentioned as one example where greater collaboration within HRDC

would be beneficial. For example, youth are at a higher risk of being injured at work with one-third of accident victims compensated for time lost aged 15 to 29 between 1993-97. The Human Resources Investment Branch (HRIB) has a program specifically designed for Youth at Risk. There may be a greater opportunity for Labour and HRIB to collaborate and integrate efforts to address the needs of this priority group.

7. Survey of Approaches in Occupational Safety and Health Jurisdictions

OSH programs, whether provincial or federal, are concerned with preventing workplace accidents and occupational diseases. Provincial OSH officials were interviewed in five regions and asked to comment on their approaches to administrating provincial OSH programs. The type and impact of legislation, the size and nature of jurisdictions as well as resource levels all vary, so direct comparisons cannot be made between jurisdictions. However, the survey found that a number of common themes or approaches are shared between jurisdictions. These are listed below and cross-referenced to the review elements of this report. Appendix C has the specific details for each jurisdiction surveyed. Labour/OSH is in a position to benefit from lessons learned from provinces as they are a member of the Canadian Association of Administrators of Labour Legislation Occupational Safety and Health Committee (CAALL-OSH), a forum for many of the common interests between jurisdictions.

Common Themes

- Clear mandate and strategy has been developed and communicated. – *Strategic Direction*
- Increased focus on prevention (education) activities. – *Strategic Direction*
- Investment in communications and employer and public awareness and education. – *Supporting Capability - Client Education Strategy*
- Enforcement (inspection) activity remains a core function. – *Strategic Direction and Operational Planning*
- Access to current and comprehensive data on injury and costs. – *Information for Decision Making*
- Research and analysis, including data mining capacity evident. – *Information for Decision Making*
- Utilisation of employer accident and injury history data to effectively target prevention and enforcement activities. – *Information for Decision Making*

- Working with industry sectors and associations in improving safety and health performance, especially with poor performing employers. – *Operational Planning and Information for Decision Making*

- Employer and industry/partnerships and incentives in place. – *Collaborative Relationships*

- Technology investment to support internal and external integration of information. – *Supporting Capability - Tools*

- Officers carry only OSH responsibilities. – *Operational Planning – Specialist-Generalist Concept*

- Recruitment emphasises technical and academic requirements. – *Supporting Capability*

- Results:
  - Jurisdictions set targets usually for accident and injury rate reduction.
  - Performance is tracked and reported against targets in a timely manner. – *Results Measurement*

APPENDIX A

REVIEW OBJECTIVES, METHODOLOGY, AND SCOPE

OBJECTIVES

The review objectives were:

- to assess the administration of the OSH program to ensure that OSH legislated and regulatory obligations are fulfilled; and
- to identify opportunities that would potentially enhance the administration of the OSH program.

METHODOLOGY AND SCOPE

- Interviews with Labour management and staff took place at National Headquarters as well as Regional and Local offices within British Columbia, Alberta, Ontario, Quebec, and New Brunswick.
- In each of the regions visited, a provincial director or manager of the Occupational Safety and Health program was interviewed. The purpose of these interviews was to compare and contrast program administration, emphasis, and approaches between the federal and provincial jurisdictions. Interview information was supplemented with documentation review.
- Data analysis on program inspection activities
- Review of documentation of program improvement studies undertaken in recent years to understand program issues, constraints and progress.
- The review did not cover all facets of the OSH program. Limitations included:
  - Fire Protection Services, (CAC Organizational Analysis was done in 1997);
  - Industrial Hygiene Laboratory, (CAC Analysis of Alternative Delivery Options was done in 1996); and
  - The effectiveness of the work carried out by Transport Canada (TC) and compliance to the control provisions outlined in the MOU signed with TC in July 1998. (Transport Canada was conducting a program review of the Aviation OSH including the interface with HRDC-Labour program.)
  - Resource Allocation Model and Levels

APPENDIX B

OCCUPATIONAL SAFETY AND HEALTH (OSH) PROGRAM PROFILE

OSH in federal works, undertakings and businesses is governed by Part II of the CLC. The policy objective is to *prevent accidents and injury to health arising out, linked with or occurring in the course of employment.* More than one million Canadians work at 40,000 work sites regulated under federal labour laws.

The magnitude of occupational safety and health is reflected in these 1997 statistics[2].

Canada:

- on average, one Canadian worker out of 16 was injured at work ;
- Workers' Compensation Boards (WCBs) paid over $4.5 billion in benefits; and
- the annual total cost of occupational injuries to the Canadian economy is estimated at over $9.1 billion.

Federal Jurisdiction:

- injury rates in 1997 are the lowest in five years;
- fatalities (59) from work–related illness and injury are the highest in five years; and
- estimates of the direct and indirect costs of health-related absences in the federal government approach $1.5 billion annually[3].

Labour expenditure and resource levels for 1998-99:

- $109.5M net expenditures in 1998-99 (.4% of HRDC totals)
- 612 FTEs (2.9% of HRDC totals)

[2] HRDC Labour Occupational Injuries & Their Cost in Canada 1993-1997
[3] Treasury Board

APPENDIX C

SURVEY OF APPROACHES IN OTHER OCCUPATIONAL SAFETY AND HEALTH JURISDICTIONS

OSH programs, whether provincial or federal, are concerned with preventing workplace accidents and occupational diseases. Provincial OSH officials were interviewed in five regions and asked to comment on their approaches to administrating provincial OSH programs. The type and impact of legislation, the size and nature of jurisdictions as well as resource levels all vary, so direct comparisons cannot be made between jurisdictions. However, the survey found that a number of common themes or approaches are shared between jurisdictions. The US Occupational Health and Safety Administration Internet site was also researched. The details from each jurisdiction are listed by the various review elements in this appendix.

British Columbia Province – Prevention Division, Workers' Compensation Board

Strategic Planning

- Key policy and operational decisions in 1998 concerned the WCB's business plan and budget, which included increased investment in prevention activities.

- *Mandate* (Prevention Division): Dedicated to *preventing* workplace injuries, diseases and fatalities.

- Strategic Plan -1998
  - Focuses the WCB on:
    - Making injury and disease prevention a community priority
    - Re-aligning services to encourage greater workplace accountability for accident prevention.

Operational Planning

- Focus on prevention has taken shape by:
  - A number of inter-related activities designed to assist workers and employers to recognize and understand health and safety risks they may face; and
  - Ensuring all possible accident prevention and safety protection measures are in place through combination of consultation, enforcement, research and technical support.

- *Worksafe*, the cornerstone of Prevention Division's efforts is portfolio of education, consultation and awareness building activities complemented by compliance monitoring and enforcement.

- *Worksafe strategies* in 1998 included:
  - Focusing on high-risk industries and firms targeted education, consultation, research and regulatory compliance efforts
  - Development of joint worker and employer health and safety initiatives
  - Regional approach
  - Educational materials for workers at greatest risk
  - Focusing on large firms
  - Focusing on education; education partnerships particularly focuses on youth
  - Focusing on compliance
  - Focusing on accident causality
  - Support of research and education initiatives

- Objective is to achieve 60% of activities in education/consultation and 40% inspection/enforcement.

- Programs (research and development) group "mines" data. This is used to target resources based on industry, employer, and region. Data, including nature and cost of injuries is shared with employers.

- *Information Services*
  - In 1998 pilot projects launched to speed claims process – Medi-Connect and Employer-Connect provide Internet based information exchange systems that allow for electronic submission of reports.
  - All employers will be required to submit reports electronically within 5 years.

Supporting Capability

- Change in philosophy is towards seeing safety officers as "change agents".

- New recruits receive extensive formal training followed by in-field mentoring. Initial and on-going training focuses on legal, technological and project management skills. Board brings in out-side speakers to cover topics such as new technologies.

- In 1998, the new Occupational Health and Safety regulation took effect. A third of standards are substantially revised or new reflecting changing workplace technologies and risks – extensive staff training and employer and worker education has supported implementation.

Results Measurement

- In 1998 considerable attention was focused on implementing recommendations of the BC Auditor General to strengthen accountability reporting. BC WCB has moved to results focus – performance plan translates accountability for overall performance goal to level of individual officer
- *Goal*: Decrease BC's injury rate by 4 % per year
- *Definition*: Number of short-term disability claims divided by total person-years covered. Expressed per 100 person-years.
- *Targets:* 1998 Target achieved 4.9; 1999 Target 4.7; and 2003 Target 4.0
- Reported marked decrease in injury rate within sectors subject to targeted interventions.

New Brunswick Province – Workplace Health, Safety, & Compensation Commission

Strategic Planning

- Workplace Health, Safety and Compensation Commission has a mandate including:
  - Actively promoting the prevention of accidents
- 1998 Business Plan includes the following directions under the prevention mandate:
  - Transferring resources from elsewhere in the agency to prevention
  - Risk Management Services
  - Focusing resources
  - Public Awareness/Prevention Strategy
  - Regulatory review
  - Communications

Operational Planning

- Resources have been transferred into the prevention activity as long as it results in a decrease in occupational injuries.
- The Risk management program is based on working with employers to go beyond regulatory compliance and active prevention through financial incentives and the provision of a set of evaluation tools (goal is to expand program and add new employers).
- Aim of focusing resources, in activities that are not pre-determined, is to achieve lasting change in behavior that is not dependent on interventions.
- Targeting of key employers for intensive intervention.

- Targeting industry groups for pilot interventions.
- Taking steps to improve public awareness of the importance of good health and safety practices in the workplace.
- Prevention strategy – communicating attitude that "all accidents are preventable".
- Taking steps to improve public awareness of importance of good health and safety practices.
- Focused approach – building framework and piloting health and safety improvement program with select industry groups.
- Focused approach – data driven decisions.

Supporting Capability

Support for program officials

- Significant effort has been put into development of the Workplace Information System (WIS). Initiated in 1996, this is an integrated system allowing for:
  - Capture of client information from service providers
  - History of activities performed
  - Measurement of progress
  - Prevention of duplication
  - Strategic planning
  - Facilitation of referrals
  - Linking of different databases

Ontario Province – Ministry of Labour

Strategic Planning

- Recent name-change to Workplace Safety and Insurance Board (WSIB) reflects new preventive mandate.
- Goal is to make Ontario workplaces among the safest in the world
- Key principles guiding activities include:
  - enhancement of workplace self-reliance;
  - increased co-operation through the forging of strong partnerships;
  - encouraging best practices and high-performance; and
  - effective enforcement targeting poor health and safety performers.
- Focus is on seeing all contributors/players in Occupational Health and Safety (i.e. Ministry of Labour, the Workers Compensation and Insurance Board (WSIB), and WSIB-funded safe

workplace associations) as part of an OSH system. There has been substantial harmonization and co-ordination of policy and program development among players.

Strategic Plan 1999-2002

- The Ministry of Labour's role in reducing workplace injury and illness is to set, communicate and enforce standards.

Strategic directions and commitments

- Clarification of roles and co-ordination of organizations within the OSH system.
  - Mechanisms between MOL and WSIB to meet joint responsibility to provide leadership in policy, priorities goals and standards.
  - Integrated strategic approach to OHS in annual plans of partners.
  - Collaboration on seamless technology-based information and inquiry system.
  - Performance agreements for organizations within public OSH system.

- Building commitment in the workplace and fostering self-reliance.
  - Internal responsibility system is re-affirmed.

- Workplace standards will continue to be made easier to understand and more pertinent
  - Financial incentives are being expanded
  - Refining targeting of workplaces that lack commitment to health and safety
  - Encouraging participation in, or creation of new, associations and organizations that enable them to benchmark their OHS performance and facilitate the sharing of information and expertise

Operational Planning

Concrete operational actions

- Raising awareness in the Community and Workplace
  - Campaigns promoting health and safety – aimed at shifting societal values (WSIB/SWAs).
  - Recognizing high performance and self-reliant firms.
  - Incorporation, where practical, of health and safety into school curricula and apprenticeship programs.
  - Providing owners of new businesses, when registering, with information on health and safety and personal contact to provide information on the workplace health and safety support system.
  - MOL enforcement activities increased and publicized.

- Providing Information and Expertise to support workplaces or build partnerships
  - Inventories of public and private occupational health and safety resources available
  - Expanding linkages between employers with resources and expertise and those without. Initiatives providing incentives for mentoring between high-performance businesses and other firms
  - Expanding the Safe-communities initiative

- Developing common database of workplace injury claims

- Inspections have increased by 26% in the last four years (lost-time injuries have reduced by 26%).

Partnership

- The WSIB and MOL are pursuing Occupational Health and Safety goals in a coordinated way – a common strategy is in place to coordinate and optimize roles, together with the roles of other OSH players.

Results Measurement

- Ministry has set target of reducing lost-time injuries by 30 % over five years (1995 - 2000)

- WSIB injury statistics are used to monitor system –wide trends, target priority sectors and firms, set performance objectives and determine whether objectives are met i.e.
  - Fatalities
  - Amputations and permanent disabilities
  - Lost-time injuries
  - Total injury frequencies
  - Measures of injury severity

Québec Province – Commission de la santé et de la sécurité au travail

Strategic Planning

Mandate

- Prevention activities and client education to reduce workplace accidents and occupational disease.

Strategic Plan -1998

- Focuses on:
  - Increasing support of employers efforts in occupational safety and health
  - Prevention as a priority
  - Collaboration with employers to enhance understanding of occupational health and safety
  - Targeting of priority industries i.e. Construction

Operational Planning

- Provincial operations are distributed amongst 21 regional divisions. A total of 268 officers are responsible for both proactive and reactive work.

- The officer's job description is to inform, to support, and to enforce.
- Penetration rate is around 5% per year.
- Variety of promotion, advertising campaigns throughout the year (blitz each fall, school program to reach students) – attempt to change the culture of present and future employees.
- Total inspections per year – 10,000.

Priority targeting

- 6 industry groups have been identified. Work is focused on employers with the highest claim rate and accident rates, and also based on officer knowledge of the industry.
- Division of officer's workloads is approximately 30% of their time on reactive workload (i.e. fatality investigations). The other 70% are comprised of 30% provincial prevention programs, 40% regional programs.

Partnerships

- Work with joint sector-based associations - 12 different associations, associations then serve as resource for employers
- Partnership with the Ministry of Education (integration of OSH into school curriculum)

Supporting Capability

- Officers are now seen in the workplace as advisers who can play a positive role in assisting employers.
- Officers are offered a life-long learning plan – objective is to offer the most up-to-date skills and competency training.
- 6 months of training, fieldwork are offered before autonomous work.
- Officers are hired based on skills and general competencies – recruitment is not specifically for highly specialized individuals

Results measurement

- No specific targets have been set for reducing the injury rate.
- A few secondary targets for specific interventions are tracked – i.e. objective of reducing by

25% the frequency of face injuries for welders.

- Perception is that current performance with respect to occupational safety and health represents a plateau – and that further reducing the injury rate will require discovering a new way of doing business.

Alberta Province – Human Resources and Employment

Strategic Planning

- *Mandate* - Work in partnership with Albertans to promote safe and healthy workplaces

- *Strategic Plan 1999-2002*
  - Promote a preventive approach to workplace health and safety by working with industry partners to encourage employers and workers to build effective health and safety programs.
  - Provide compliance programs targeting poor health and safety performers and uncontrolled hazards.
  - Respond promptly to workplace complaints and provide advice and recommendations to customers to enable them to address health and safety issues.
  - Work with industry groups and associations in the development of codes of practice, recommended practices, safe operating procedures and standards, identification and management of hazards and safety information.
  - Ensure legislation and regulations support meaningful and productive standards of practice. A review will be conducted from spring 1999 through 2002.

Operational Planning

- Highlights of the key strategies include:
  - Working with Industry Partners to encourage employers and workers to build effective health and safety management programs
    - Implementing standards for the auditing and certification process to ensure quality and consistency within Partnerships Program
    - Implementing communication strategy to contribute to understanding and recognition
  - Effective compliance programs targeting poor health and safety performers and uncontrolled hazards.
    - Developing and implementing field compliance and inspection programs that focus on:
      - Significant uncontrolled hazards
      - Poor health and safety performers
      - New employers
  - Working with external organizations to identify and control hazards

- Have identified prevalent and poorly controlled hazards from checklist (a standardized compliance checklist, which allows for comprehensive data on hazard control)
- Participate in development of CSA standards, codes of practice, recommended practices, safe operating procedures, etc.
- Information and awareness campaigns, publications, Internet

- Ensuring legislation and regulations support meaningful and productive standards of practice
  - Conduct of comprehensive regulatory review and the development of interpretive guidelines and/or enforceable standards

Supporting Capability

- Pay system is competency based (i.e. pay level is based on acquiring/demonstrating certain competencies) – guidance is given on meeting competency requirements.

Results Measurement

- "Lost Time Claim Rate"
  - Represents the risk (or probability) of disabling injury or disease to a worker during a period of one year's work. The rate is expressed as a percentage.

- *Target*: The lost time claim rate will not exceed 3.5

- *Results*: 1995/96/97: 3.4

Management Indicators

- Provide information used to measure the results of activities. Targets are identified for all Workplace Health and Safety Management Indicators. These indicators include:
  - Lost – Time Claim Rate for Certificate of recognition holders (compared to industry rates)
  - Lost-Time claim rates for specific employers assigned to targeted employer program (compared to base-line rates)
  - Lost-Time claim rate for Specific Industry Sectors compared to base-line rates
  - Aggregate percentage of workplaces with specified controlled hazards

United States – Occupational Health and Safety Administration (OSHA)[4]

Strategic Planning

- Strong enforcement continues to be a priority, with OSHA targeting inspections based on site-specific injury and illness data

[4] *Information from the OSHA Internet site*

- Creative partnerships – companies that demonstrate excellence in workplace health and safety may request OSHA recognition under the agency's premier partnership - the voluntary protection program. Specialized partnerships have also focused on specific issues.

- Improved rule-making – new OSHA rules will emphasize outcomes and results rather than specific requirements.

- Recent regulatory reform initiatives

- OSHA has *changed its fundamental operating paradigm* from one of command and control to one that provides employers a real choice between partnership and a traditional enforcement relationship

Common Sense Regulation

- OSHA priorities and regulatory strategy: five point regulatory strategy:
  - Identify clear and sensible priorities
  - Focus on clear building block rules
  - Eliminate or fix confusing and out-of -date standards
  - Emphasize plain language
  - Rely on co-operative partnerships

- Results not red-tape – focusing on the most serious hazards and the most dangerous workplaces and by insisting on results

- Expanded outreach and education – OSHA is planning extensive outreach to assist employers in developing safety and health programs and addressing ergonomic hazards.

Operational Planning

- OSHA is working with employers to adopt best practices for finding and fixing recognized hazards by offering choice between partnership and traditional enforcement.

- Approach seeks to encourage the development of workplace health and safety programs. Features looked for include:

  - Management commitment, meaningful participation of employees, a systematic effort to find safety and health hazards, documentation that hazards are fixed, training and ultimate reduction in injuries and illnesses.

- Employers are offered choice:
  - For firms with strong and effective health and safety programs: partnership; for firms that do not implement strong and effective health and safety programs: traditional enforcement.

- Successful features of the partnership program include:
  - Using work-site specific data to help identify high-hazard workplaces, providing information to employers about effective safety and health programs; offering employers a choice in how they want to work with OSHA, ensuring management commitment and worker involvement and modifying enforcement policies.

- Focused inspections are offered for Employers with Strong and Effective Safety and Health programs.

- Incentives are also offered for employers with health and safety programs in the form of penalty adjustments.

- Initiatives also focus on:
  - Increasing interaction with business and labour in addressing challenging workplace health and safety issues: improving hazard communication in the workplace: new approaches to new hazards; involvement in non-traditional sectors.

- Relying on data that the agency began collecting in 1995 from a variety of internal and external sources, including data from State workers' compensation agencies – to target employers with high rates of accidents and injuries.

- Agency has implemented a number of information dissemination projects and plans to undertake new initiatives to improve availability of health and safety data.

Supporting Capability

- Agency is working to improve training for inspectors to help them learn to evaluate workplace health and safety programs. System analysis – as opposed to identifying specific hazards during inspection represents a new approach – a culture change.

Results Measurement

- OSHA inspectors have been told clearly that there are no numeric inspection goals and that their performance will not be judged by the number of citations and fines they issue but by their success in finding and reducing hazards associated with injuries and illnesses.
- OSHA has phased in a performance measurement framework, which has shifted emphasis from tracking activities to monitoring results. This has improved the agency's ability to quantify its successes, identify the most efficient and effective program mix, and promote the development of programs and policies based on solid objective information.

Primary outcomes:

- Change in magnitude of occupational injuries and illnesses

- Over the next four years, OSHA is committed to reducing workplace injuries and illnesses in three target groups:
  - 100,000 workplaces where major interventions are conducted (20 percent reduction);
  - The five high-hazard industries – food processing, nursing homes, shipyards, logging and construction (15 percent); and
  - Three serious safety and health problems – silicosis, amputations and lead poisoning (15 percent).

APPENDIX D –1

INSPECTION AND TIERING RISK TABLES[5]

Table 1 – National Industry Tiering
Program General Inspections (PGOs) Completed April 1- Sept .30, 1999

Tiering Rating (risk)	1	3	5	7	9	Totals
	very low	low	medium	high	very high	
Ontario						
Worksites	3126	1259	4304	3481	11	12181
PGOs completed	0	7	26	60	0	93 (0.8%)
% -PGOs completed by tier	0%	8%	28%	65%	0%	
British Columbia						
Worksites	831	576	1923	1228	0	4558
PGOs completed	2	6	31	82	0	121 (2.7%)
% -PGOs completed by tier	2%	5%	26%	68%	0%	
New Brunswick						
Worksites	200	184	623	616	0	1623
PGOs completed	1	10	15	37	0	63 (4%)
% -PGOs completed by tier	2%	16%	24%	59%	0%	
Quebec						
Worksites	1580	1260	2883	2004	0	7727
PGOs completed	3	3	27	82	0	115 (1.5%)
% -PGOs completed by tier	3%	3%	23%	71%	0%	
Alberta						
Worksites	724	422	1400	2018	0	4564
PGOs completed	0	7	37	30	0	74 (1.6%)
% -PGOs completed by tier	0%	9%	50%	41%	0%	
All 5 Regions						
Worksites	6,461	3,701	11,133	9,347	11	30,653
PGOs completed	6	33	136	291	0	466
% - PGOs to total worksites	**0%**	**1%**	**1%**	**3%**	**0%**	**2%**
% -PGOs completed by tier	1%	7%	29%	62%	0%	

Data source: LOIS

Tiering rating descriptions: 1 = no plan to inspect; 3 = inspect every 36 months; 5 = inspect every 24 months; 7 = inspect every 12 months; 9 = inspect every 6 months

[5] Limited interpretation should be applied to Table 1. It reflects only six months of activity and is not national in scope.

APPENDIX D-2

INSPECTION AND TIERING RISK TABLES[6]

Table 2 – Regional Industry Tiering
Program General Inspections (PGOs) Completed April 1- Sept .30, 1999

Tiering Rating (risk)	1 very low	3 low	5 medium	7 high	9 very high	Totals
Ontario						
Worksites	3734	2416	3011	3018	99	12278
PGOs completed	2	12	24	35	8	81
% -PGOs completed by tier	2%	15%	30%	43%	10%	
British Columbia						
Worksites	1683	1116	1152	736	3	4690
PGOs completed	37	17	17	45	1	117
% -PGOs completed by tier	32%	15%	15%	38%	1%	
New Brunswick						
Worksites	935	173	214	287	3	1612
PGOs completed	1	15	10	35	0	61
% -PGOs completed by tier	2%	25%	16%	57%	0%	
Quebec						
Worksites	1103	3417	1918	1274	10	7722
PGOs completed	3	13	43	57	1	117
% -PGOs completed by tier	3%	11%	37%	49%	1%	
Alberta						
Worksites	1040	956	1273	1395	3	4667
PGOs completed	0	18	44	20	0	82
% -PGOs completed by tier	0%	22%	54%	24%	0%	
All 5 Regions						
Worksites	8,495	8,078	7,568	6,710	118	30,969
PGOs completed	43	75	138	192	10	458
% - PGOs to total worksites	**1%**	**1%**	**2%**	**3%**	**8%**	**1%**
% -PGOs completed by tier	9%	16%	30%	42%	2%	

Data Source: LOIS (REPN013)

[6] Limited interpretation should be applied to Table 2. It reflects only six months of activity and is not national in scope.

APPENDIX D-3

INSPECTION AND TIERING RISK TABLES[7]

Table 3 – Comparison of Regional Industry Site Tiering to National Tiering
Program General Inspections (PGOs) Completed April 1- Sept .30, 1999

Tiering Rating (risk)	1 very low	3 low	5 medium	7 high	9 very high	Totals
Worksites- All 5 Regions						
National Industry Tiering	6,461	3,701	11,133	9,347	11	30,653
Regional Site Tiering	8,495	8,078	7,568	6,710	118	30,969
PGOs Completed						
National Industry Tiering	6	33	136	291	0	466
Regional Site Tiering	43	75	138	192	10	458
% - PGOs to total worksites						
National Industry Tiering	**0%**	**1%**	**1%**	**3%**	**0%**	**2%**
Regional Site Tiering	**1%**	**1%**	**2%**	**3%**	**8%**	**1%**
% - PGOs by tiering						
National Industry Tiering	1%	7%	29%	62%	0%	
Regional Site Tiering	9%	16%	30%	42%	2%	

[7] Limited interpretation should be applied to Table 3. It reflects only six months of activity and is not national in scope.

APPENDIX E

MANAGEMENT'S RESPONSE TO REVIEW OF LABOUR BRANCH OSH PROGRAM

Recommendation	Activities/Actions	Outcomes/Results	Responsible Officer(s)	Target Completion Date	Status
1. OSH strategic direction and priorities should be updated to ensure clarity, promote consistency of planning, improve co-ordination and facilitate strategic allocation of resources.	The recent amendments to Part II of the Canada Labour Code have legislated the new strategic direction of the OSH program and necessitated the updating of priorities. The strategy behind the amendments is to strengthen the internal responsibility system (IRS) thereby allowing more of the existing resources to be directed at achieving the purpose of the Code, namely prevention of accidents and injuries, in places where the IRS is either not functioning or has failed. Orientation sessions for safety officers, their managers, and clients are being organized to clarify the new regulatory approach.	a) More self-reliant work sites b) More resources for prevention c) Fewer accidents and injuries	DG Ops with Dir. OSHFP	Meeting of safety officers scheduled for end Sept. 2000 Meetings with clients by Apr. 2001	Bill C-12 passed in June 2000, scheduled for proclamation in Sept. 2000 National Conference being organized Meetings being organized
	The Operations Program Directive (OPDs) on priorities of interventions (for Parts II and III combined) and tiering (i.e. ranking) of work sites under Part II are being updated, and analytical tools are being developed, which will result in high-risk work sites being targeted for prevention activities.	a) More coherent and focused interventions b) Activities more clearly linked to purpose of Code (i.e. prevention) c) Re-alignment of resources between and within Programs, if necessary d) More effective use of available resources	DG Ops with regional heads of Labour	Full implementation starting FY 2001-2002	Working groups updating OPDs; targeting tools being perfected
	A five-year strategic plan and accompanying business plans will be developed to translate legislative and program orientations into action. The plan will be developed in collaboration with client groups and will be widely communicated internally and externally.	Clear and communicated program strategies, objectives, action plans and expected results	DG Ops and regional heads of Labour	Mar. 2001	Under development

Recommendation	Activities/Actions	Outcomes/Results	Responsible Officer(s)	Target Completion Date	Status
2. Continue to address the long-standing issue of limitations in program data and management information through various measures. One possible means of improving the timeliness, accuracy and comprehensiveness of program databases is agreements with provincial Workers' Compensation Boards to obtain injury information.	Maintain and strengthen internal data collection to provide necessary information for strategic allocation of resources, risk management and Program performance monitoring. Rationalize databases and integrate with WCB data as it becomes available. Specific steps taken to address data limitations include:				
	1. Improved collection of Employer's Annual Hazardous Occurrence Investigation Reports (EAHOIR)	a) Higher response rate b) More accurate client universe c) More consistent enforcement of reporting requirements	DG Ops with regional heads of Labour	Implemented in 1999	On-going; response rate increased from 80s to over 90%
	2. Develop and implement quality assurance program for EAHOIR data including production of client education tools	More accurate information for targetting, allocation of resources and monitoring	Dir. OSHFP with Dir. Client Ed.	Apr. 2001	Under development
	3. Cross-validation of data from various sources to ensure employers comply with reporting requirements	Higher compliance with reporting requirements	Dir. OSHFP with regional heads of Labour	Cross-validation starting in Apr. 2002	At planning stage
	4. Regions to enter all Hazardous Occurrences Investigation Reports (HOIRs) in LOIS/ LA2000.	a) More complete injury records b) More reliable performance indicators	Regional heads of Labour	Start in Apr. 2000	Agreement reached in Feb. 2000
	5. OPD on tiering (i.e. ranking) of Part II interventions will be revised to include employers not submitting HOIRs	More compliance with HOIR provisions of Code	DG Ops with Regional heads of Labour	Apr. 2001	At planning stage
	6. New injury coding system compatible with WCB information will be implemented with the commissioning of LA2000	Deficiencies in quality of HOIR data corrected and coding standardized (using CSA standard) to facilitate data mining	Dir. OSHFP with regional heads of Labour	Nov. 2000	In progress
	7. Develop and implement quality assurance program for HOIR data	Improved quality and consistency of data	Dir. OSHFP with regional heads of Labour	Apr. 2001	In progress

Recommendation	Activities/Actions	Outcomes/Results	Responsible Officer(s)	Target Completion Date	Status
	8. Improve HOIR and EAHOIR forms and enable electronic reporting	a) Simplified reporting of data b) Reduced workload for Program and employers c) Implementation of government on-line	Dir. OSHFP with Dir. CET and regional heads of Labour	Improved forms by Dec. 2001; electronic reporting by Dec. 2002	At planning stage; progress dependent on funding of Labour IT priorities
	9. Federal jurisdiction injury database (FJID) updated annually and linked with LA2000	Up-to-date client registers	Dir. OSHFP with regional heads of Labour	Updating implemented; linkage by Apr. 2001	Updating ongoing; linkage being planned
	10. Develop and implement quality assurance program for LAO assignments	Consistent quality of Program data	Dir. OSHFP with regional heads of Labour	Apr. 2001	At discussion stage
	LA2000 contains the following enhancements: a) Information entered at the district level will be accessible at the regional and national level as soon as it is entered instead of being updated monthly.	More timely information available at the regional and national level	Dir. Labour Operations Applications Div. (LOAD)	Nov. 2000	Application being developed
	b) Complete electronic inventory of all documents produced by LAOs	Electronic search of all documents pertaining to user-defined key words, e.g. asbestos fibres	Dir. LOAD	Nov. 2000	Application being developed
	c) Improved on-line edits and drop-down menus	More accurate data	Dir. LOAD	Nov. 2000	Application being developed
	The OSH Program has been pursuing and continues to pursue the obtaining of federal injury information from provincial and territorial Workers' Compensation Boards (WCBs). Several regions have or have had access to data from their local WCB. The information supplied varies widely. As a result of provincial privacy issues, Quebec Region has lost access to CSST data. Recent public attention to privacy issues involving HRDC has complicated matters. The initiative is nevertheless continuing:	While it is expected that WCB information when integrated with Program information will improve the quality and timeliness of decision making, in the short to medium term, its greatest opportunity resides in supplementing Program information to assist in focusing on high risk areas, particularly health hazards.	Dir. OSHFP with regional heads of Labour	Agreements with all WCBs by Dec. 2001	At discussion stage

Recommendation	Activities/Actions	Outcomes/Results	Responsible Officer(s)	Target Completion Date	Status
	a) A review of local data sharing agreements, whether formal or informal, has been undertaken. This review will provide information on key issues and potential partners for pilot agreements.	In order to ensure national consistency in strategic planning, Program delivery and performance assessment and monitoring, strategic allocation of resources, and targeting and tiering of work sites must continue to be based on Program data, which is available in comparable quality and form to all regional components.			
	b) OSHFP has established contacts with the Chief Financial Officers of WCBs and with members of the OSH Committee of the Canadian Association of Administrators of Labour Legislation (CAALL-OSH committee) to promote injury information sharing agreements. Some provinces have shown interest and contacts are being established between NHQ, the local regions and the WCBs to initiate discussions. Based on preliminary discussions, one or two WCBs will be selected to pilot negotiations for data sharing agreements				
3. Implement the new key performance indicator (DIIR) and monitor and report on progress towards goal attainment. The utility of this indicator will depend on the quality of underlying OSH Program data (see previous recommendation).	The old performance indicator was based on the percentage of minor violations resolved through Assurances of Voluntary Compliance (AVCs). The National Labour Operations Committee (NLOC) concluded in Sep. 1997 that this was insufficient to assess the effectiveness of the OSH Program and commissioned a working group to propose a more appropriate performance indicator. The WG recommended a performance indicator based on the disabling injury incidence rate (DIIR). NLOC adopted it in Oct. 1999 and the following implementation plan in Feb. 2000 which includes steps to overcome data limitations and integrate the DIIR into the Program's performance measurement framework:	a) Performance indicator based on DIIR is a direct measure of the effectiveness of the Program in achieving the purpose of the Code - the prevention of injuries b) DIIR will force resources to be directed to where they will have the greatest impact on reducing injuries c) When WCB data becomes available, more occupational health hazards will be addressed	DG Ops with regional heads of Labour		

Recommendation	Activities/Actions	Outcomes/Results	Responsible Officer(s)	Target Completion Date	Status
	• Phase I include improvements to EAHOIR data collection described in recommendation 2 above. The DIIR will be based on EAHOIR data only. Reference values will be based on data from calendar years 1998 and 1999.	Interim annual DIIR values until up-to-date injury information from HOIRs is fully entered and available	Dir. OSHFP	DIIRs for 1998 and 1999 by Dec. 2000	In progress
	• Phase II includes the improvements to HOIR data collection described above and the linking of FJID with LA2000. The DIIR will be based on employment data from FJID and injury data from LA2000. Reference values will be based on data from fiscal years 1999-2000 and 2000-2001. It will be possible to monitor DIIR of work sites that were inspected.	Full implementation of DIIR	Dir. OSHFP	Implement Apr. 2001; first results on goal attainment by Apr. 2002	In progress
	• Phase III includes the acquisition and integration of WCB injury information from all 14 WCBs and the calculation of performance indicators based on employment data from the FJID and injury data from the WCBs.	Ultimate DIIR	Dir. OSHFP	When data becomes available from all WCBs	In progress
4. Use the DIIR data in day-to-day program management, setting performance targets for managers, and directing resources to higher risk areas within and across Regions.	Data similar to the DIIR is being used since 1999 in the planning of interventions. NLOC adopted the 1999 OSH Planned Interventions Targeting Tools in Oct. 1999 to assist in selecting employers for inspection and in focusing on the most common risks. The targeting tools are based on disabling injury frequency rate (DIFR) which is based on hours worked rather employment, but is essentially equivalent to the DIIR. Updated targeting tools will be produced in year 2000.	Resources directed at reducing injuries in most dangerous work sites.	Dir. OSHFP with regional heads of Labour	Implemented	Implemented
	A proposed revised OPD on tiering (i.e. ranking) will direct Regions to use the DIIR in selecting work sites for inspection.	Improved and consistent targeting	Dir. OSHFP with regional heads of Labour	Apr. 2001	In progress

Recommendation	Activities/Actions	Outcomes/Results	Responsible Officer(s)	Target Completion Date	Status
	Higher risk areas are identified by comparing the work site DIFR or DIIR to that of the industry it belongs to and selecting those with the highest ratios for the most frequent inspections.	More effective utilization of resources	Dir. OSHFP with regional heads of Labour	Apr. 2001	In progress
	A five-year strategic plan and accompanying business plans as well as performance measurement management framework will address performance targets at all levels as well as strategic allocation of resources. More specifically, the performance measurement management framework will set overall Program goals/targets for reducing the DIIR, discuss how to integrate performance targets in strategic plans, business plans and local performance objectives and the overall accountability structure; and discuss the form, manner and timetable for performance reporting and monitoring.	Clear Program performance expectations and accountability, roles and responsibilities for results.	Dir. OSHFP with regional heads of Labour	Apr. 2001	In progress
5. Ensure that tracking of operational measures is adequate and meaningful.	Operational performance measures will be integrated with the performance measurement management framework discussed in recommendation 4 above. For example, LA2000 will provide managers at all levels with the tools to monitor and assess the performance of their resources towards meeting their goals and adjusting their work plans in response to shortfalls. Requirements for new and updated operational performance measures will be reviewed. Additional performance measures recommended for development by the OSH Performance Indicators Working Group will be considered for implementation.	Adequate and meaningful tracking of operational measures.	Dir. OSHFP with regional heads of Labour	Dec. 2001	At discussion stage

Recommendation	Activities/Actions	Outcomes/Results	Responsible Officer(s)	Target Completion Date	Status
6. Continue development and implementation of a national client education strategy, including appropriate resourcing and tools.	A client education strategy for the implementation of Part II amendments has been drafted. Three approaches will be used: tripartite, sectoral and individual client (employer/employees). The objective is to leverage the clients in disseminating the desired information.	a) Clear and consistent understanding of new regulatory approach based on a strengthened internal responsibility system, including the roles and responsibilities of employers and employees b) Establish and maintain working relationship with clients	Tripartite approach and tool development led by Dir. Client Ed.; sectoral and individual client approaches led at local level Dir. Client Ed.	Aug.-Dec. 2000 for tripartite; Aug.-Oct. 2000 for sectoral; by Apr. 2001 for individual clients	Plans being developed
	Clients will be surveyed to determine their publication needs and results will be used to update publications.	a) More responsive publications b) Up-to-date publications		Dec. 2000 for questionnaire; on-going for publications	Questionnaire being prepared
	A plan to resource client education is being developed. Additional resources will be assigned to Client Education.	Resources re-deployed to adequately fund client education activities	DG Ops with regional heads of Labour	Oct. 2000	Plan being developed